

THE LAW OFFICE OF

ELISA HYMAN, P.C.

July 16, 2021

BY ECF

Hon. Ronnie Abrams, U.S.D.J.
United States District Court - Southern District of New York
40 Foley Square
New York, New York 10007

Application granted.

SO ORDERED.

Re: *C.H. obo M.P. v. N.Y. City Dep't of Educ., et al.*
19-CV-3827 (RA) (SDA)



Hon. Ronnie Abrams
July 19, 2021

Dear Judge Abrams:

I represent the Plaintiffs in the above-referenced action and am submitting this joint status letter updating the Court on the progress of settlement in this case pursuant to the Court's endorsement of our prior status letter. *See* ECF No. 57.

Since the parties last status letter, further progress towards a global settlement has been made. The parties have agreed to a total dollar value and number of hours of the compensatory services. The parties are now negotiating the timeframe for the Plaintiff student to use the compensatory services. The parties believe they are close on that issue and are optimistic that it will be resolved.

This will only leave attorneys' fees to address, and any provisional agreement about compensatory education will be subject to the parties' ability to negotiate fees. To date, Defendants have not yet sought Comptroller approval for attorney's fees. Based on the parties' history of settling cases, however, we do not anticipate that fees will be a barrier to settlement.

The parties thus propose submitting an updated status letter, or a proposed Stipulation of Settlement, no later than August 13, 2021.

In addition, the parties request that the Court endorse a further stay of the administrative proceedings in light of the above. A proposed order is attached.

Thank you for Your Honor's patience with the parties.

Respectfully submitted,

/s/ Elisa Hyman

Elisa Hyman
Counsel for the Plaintiffs